

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of

Technical Standards for
Digital Television

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MM Docket No. 87-268

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**COMMENTS OF THE ELECTRONIC INDUSTRIES ASSOCIATION
AND THE EIA ADVANCED TELEVISION COMMITTEE**

The Electronic Industries Association ("EIA") and the EIA Advanced Television Committee ("ATV Committee") hereby comment on the agreement on technical standards for digital television ("Agreement") reached between representatives of the consumer electronics manufacturing, computer, and broadcasting industries. The Agreement is set forth in a November 27, 1996 letter to Commissioner Susan Ness and signed by representatives of the Consumer Electronics Manufacturers Association (a sector of EIA), the Computer Industry Coalition on Advanced Television Services, and the Broadcasters Caucus. As part of the Agreement, the parties state that the Commission should adopt no later than December 31, 1996 the ATSC DTV Standard ("Standard"), except for the specific video format constraints in Table 3, including the aspect ratios.

EIA and the ATV Committee wholeheartedly endorse the Agreement, and urge the Commission to act as requested by the signatories. EIA is the principle trade association of the U.S. electronics industry. The ATV Committee is composed of a diverse group of organizations, including developers, manufacturers, vendors, and installers of equipment used in the broadcast, cable television, satellite, telecommunications, and

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consumer electronics industries, as well as providers of video delivery services. EIA and the ATV Committee believe that the Agreement represents a common sense solution that will allow manufacturers, broadcasters and consumers to invest in this exciting new technology with confidence and certainty, paving the way for the most rapid possible transition to digital television.

Now that the affected industries have come to agreement, there is no room or reason to delay the Standard's adoption by the Commission. The ATSC standard that the Commission is being asked to adopt indisputably represents the world's leading digital television system. While the Agreement is the specific result of a month-long, arduous negotiation among the affected parties, it actually is the culmination of the extraordinary nine-year process that produced the ATSC standard. It reflects the consensus views of America's best scientific minds from the telecommunications, broadcasting, computer, cable television, manufacturing and motion picture industries. No broadcast standard in history has been tested as extensively, or been subjected to such lengthy and vigorous peer review, as the ATSC Standard.

EIA and the ATV Committee are aware that the group of cinematographers represented by the Film Coalition has not endorsed the Agreement.¹ This is so even though there is nothing in the Agreement or the ATSC Standard that impedes the Film Coalition's stated goal of ensuring that all films are transmitted in their original aspect ratios. This fact is underscored by the Agreement's removal of the Standard's video format

¹ It should be noted that these individuals represent a minority view in the Hollywood community. In fact, the Motion Picture Association of America (MPAA), representing eight of the largest U.S. producers of theatrical motion pictures, television programming and home video entertainment, has strongly and consistently supported the FCC's adoption of the ATSC Standard.

constraints, including the aspect ratios, from the elements to be adopted by the Commission. In addition, many expect that the transmission and display of digital television will utilize aspect ratios much more similar to those used by cinematographers than the 4:3 aspect ratio used in NTSC broadcast. For this reason, digital television may well lead to a significant reduction in the use of "panning and scanning" and other aspect ratio adjustment techniques that the Film Coalition finds objectionable. However, to the extent that the Film Coalition is seeking a requirement that all films be transmitted only in their native aspect ratios, we suggest that this issue would be more appropriately resolved outside of this proceeding.

The Commission is to be congratulated for its leadership and commitment in bringing television into the digital age. It is due to the Commission's engagement and encouragement that the affected industries were able to forge a final consensus. Yet, as the Commission well knows, agreement on the Standard is only the first step in bringing broadcast digital television to the American home. It is now essential that the Commission rapidly move forward with the process of allotting and assigning channels and devising service rules for digital television service. We urge the Commission to resolve rapidly any discrepancies in the allotment approaches proposed by the Commission and broadcast groups, and to issue implementation and transition rules and finalize channel assignments as rapidly as possible. Only when these outstanding issues are resolved can the transition to digital broadcast television truly begin.

Adoption of the Standard by the Commission is manifestly in the public interest. In numerous filings over the course of this proceeding, EIA and the ATV Committee have described the benefits that will result from the incorporation of the Standard into the Commission's rules. The adoption of the Standard will enable free

over-the-air broadcasters to compete in the digital age on equal footing with other delivery media. It will encourage the use of the Standard abroad, creating jobs for American workers and cementing America's technological leadership. It will hasten the return of valuable NTSC spectrum to the U.S. government, and enable spectrum-efficient broadcast television transmission. And it will allow the provision of digital services, many now unimaginable, that will significantly enrich the lives of the American people.

Therefore, EIA and the ATV Committee urge the Commission to realize these benefits by approving the ATSC DTV Standard as set forth in the Agreement by December 31, 1996, and to finalize digital channel assignments and service rules as expeditiously as possible.

Respectfully submitted,

ELECTRONIC INDUSTRIES ASSOCIATION
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